

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN
CRYAN, AND CHRISTIAN SEWING,

Defendants.

Case No. 1:22-cv-02854-JSR

**SUPPLEMENTAL DECLARATION OF EMMA GILMORE IN FURTHER SUPPORT
OF: (I) PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN OF ALLOCATION; AND (II) LEAD COUNSEL'S
MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND COMPENSATORY AWARDS TO PLAINTIFFS**

I, Emma Gilmore, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Pomerantz LLP ("Pomerantz"), Court-appointed Lead Counsel ("Lead Counsel") for Court-appointed Lead Plaintiff Yun Wang ("Wang" or "Lead Plaintiff") and Named Plaintiff Ali Karimi ("Karimi" or "Named Plaintiff" and, with Wang, "Plaintiffs") in this action (the "Action").¹ See ECF No. 31. I have personal knowledge of the matters set forth herein based on my participation in the prosecution and settlement of the claims asserted on behalf of the Settlement Class in this Action.

2. I respectfully submit this Declaration in further support of Plaintiffs' motion, pursuant to Federal Rule of Civil Procedure 23, for final approval of the proposed \$26,250,000 settlement (the "Settlement") that the Court preliminarily approved by Order dated October 20, 2022 (the "Preliminary Approval Order") (ECF No. 102); as well as final approval of the

¹ Unless defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement dated September 23, 2022 (the "Stipulation"). ECF No. 101.

proposed plan for allocating the proceeds of the Net Settlement Fund to eligible Settlement Class Members (the “Plan of Allocation”) (collectively, the “Final Approval Motion”) (ECF No. 104).

3. I also respectfully submit this Declaration in further support of Lead Counsel’s motion, on behalf of all Plaintiffs’ Counsel,² for an award of attorneys’ fees in the amount of 33 1/3% of the Settlement Fund, which equates to \$8,750,000, plus interest earned at the same rate as the Settlement Fund; reimbursement of Lead Counsel’s out-of-pocket expenses in the amount of \$688,352.41; and a total of \$40,000 to Plaintiffs (\$20,000 to each of Lead Plaintiff and Named Plaintiff), in accordance with the Private Securities Litigation Reform Act of 1995 (“PSLRA”) for costs and expenses, including lost wages, incurred in connection with their representation of the Settlement Class (the “Fee and Expense Application”) (ECF No. 106).

4. Attached hereto as Exhibit A is a true and correct copy of the Supplemental Declaration of Jack Ewashko Regarding (A) Mailing of Postcard Notice and Notice Packet; and (B) Report on Requests for Exclusion Received to Date.

5. Attached hereto as Exhibit B is the [Proposed] Final Judgment And Order Of Dismissal With Prejudice.

I declare, under penalty of perjury under the laws of the United States, that the foregoing facts are true and correct.

Executed this 24th day of January, 2023, at New York, New York.

/s/ Emma Gilmore
Emma Gilmore

² “Plaintiffs’ Counsel” means Lead Counsel and Bronstein, Gewirtz & Grossman, LLC (“BGG”).